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The Honorable Louis L. Stanton
 United States District Judge
 United States Courthouse
 500 Pearl Street
 New York, NY 10007

November 11, 2022

**Re: *Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Limited et al.*,
 20 Civ. 9713 (LLS)**

Your Honor:

I write on behalf of Defendants in this matter, and pursuant to Section 3.B of Your Honor's Individual Practices, to request permission to file certain papers under seal in support of Defendants' motion for summary judgment.

In the motion for summary judgment filed contemporaneously herewith, Defendants refer to various documents that Plaintiff Frontier Airlines, Inc. ("Frontier") has designated "Confidential" or "Highly Confidential" under the Stipulated Protective Order dated January 4, 2022. This material includes:

- Exhibit 7 to the Declaration of Paul Sheridan dated November 10, 2022;
- Exhibits 1-19 and 22-26 to the Declaration of Jeff E. Butler dated November 11, 2022; and
- Summaries of the foregoing in Defendants' Memorandum of Law and Statement of Material Facts Pursuant to Local Civil Rule 56.1.

Accordingly, Defendants are filing public redacted versions and under seal unredacted versions of these documents, as required by Section 8.4 of the Stipulated Protective Order. Defendants take no position as to whether there is a "most compelling reason" to seal these documents. *See Lugosch v. Pyramid Co.*, 435 F.3d 110, 123 (2d Cir. 2006). If Frontier wishes to keep the above information under seal, Defendants would have no objection to such an application by Frontier.

Respectfully submitted,

s/ Jeff E. Butler

Jeff E. Butler